

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

CELSIUS NETWORK LLC, et al.,¹

Debtors.

)
) Chapter 11
)
) Case No. 22-10964 (MG)
)
) (Jointly Administered)
)

LIMITED OBJECTION AND RESERVATION OF RIGHTS

Now comes the Vermont Department of Financial Regulation (Vermont), through counsel, and hereby reserves its rights with respect to the most recent disclosure statement filed by the Debtors, DE #3117. In support of this objection, Vermont states as follows:

INTRODUCTION

1. The above-captioned Celsius debtors commenced these bankruptcy cases by filing voluntary Chapter 11 petitions on July 13, 2022 (Petition Date).

2. Debtors continue to operate their businesses as Debtors in possession pursuant to 11 U.S.C. §§ 1107 and 1108. The cases are being jointly administered pursuant to an Order of this Court dated July 19, 2022. DE # 53.

3. Debtors' most recently filed Disclosure Statement, DE #3117, fails to address adequately the treatment of regulatory claims filed by Vermont and several others states regarding issues arising out of Debtors' pre-petition operations.

4. Vermont and several other states² have been negotiating with the Debtors regarding the language of the Disclosure Statement but to date, they have not been able to arrive at mutually acceptable language, and it is unlikely the process will be completed by the 4:00 p.m. objection deadline.

¹ Debtors include Celsius Network LLC, Celsius KeyFi LLC, Celsius Lending LLC, Celsius Mining LLC, Celsius Network Limited, Celsius Networks Lending LLC, and Celsius U.S. Holding LLC. The Debtors' principal place of business is 121 River Street, PH05, Hoboken, New Jersey 07030.

² The States of NJ, TN, TX, VT and all states represented by NAAG-AL, AR, CA, DC, HI, ID, ME, NY, OK, and SC have been negotiating with Debtors on this issue and on information and belief, all agree with the above position.

5. Vermont hereby objects to the adequacy of the disclosure statement as currently written and reserves its rights to object to the final form of the document.

For all the reasons stated herein, Vermont respectfully requests the Court deny approval of the Disclosure Statement.

Dated: August 4, 2023

Vermont Department of Financial Regulation

By: /s/ Jennifer Rood
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